

CHAITMAN LLP

Helen Davis Chaitman
Gregory M. Dexter
465 Park Avenue
New York, New York 10022
Phone & Fax: 888-759-1114
hchaitman@chaitmanllp.com
gdexter@chaitmanllp.com

*Attorneys for Defendants on Exhibit A annexed
hereto*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

DEFENDANTS LISTED ON EXHIBIT A
ANNEXED HERETO

Defendants.

SIPA LIQUIDATION

Adv. Pro. No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. Nos.
10-04352 (SMB)
10-04377 (SMB)
10-04644 (SMB)
10-04658 (SMB)

Appeal No. _____

**NOTICE OF MOTION FOR LEAVE TO APPEAL ORDER IMPLEMENTING
COURT'S MARCH 17, 2016 BENCH RULING GRANTING PROTECTIVE ORDER**

PLEASE TAKE NOTICE that, upon a Memorandum of Law in Support and the Declaration of Helen Davis Chaitman, Esq., together with exhibits annexed thereto, defendants RAR Entrepreneurial Fund, Ltd., Russell Oasis, Carol Nelson, individually and as joint tenant; and Stanley Nelson, individually and as joint tenant, and Russell L. Dusek (the “Movants”), by their undersigned counsel, hereby move the Court at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined by the Court, for an Order pursuant to 28 U.S.C. § 158(a)(3) and the Federal Rules of Bankruptcy Procedure 8001 and 8003: (1) granting leave to appeal the *Order Implementing Court’s March 17, 2016 Bench Ruling Granting Protective Order* entered on March 18, 2016 on the 08-01789 (SMB) docket [ECF No. 12912] of the United States Bankruptcy Court for the Southern District of New York (Hon. Stuart M. Bernstein); and (2) granting such other further relief in the Movants’ favor as the Court deems just and proper.

In view of the exceptional circumstances and importance of the issue presented in this appeal, Movants respectfully requests oral argument in connection with this motion. *See* Fed. R. Bankr. P. 8003(b).

Dated: New York, New York
March 31, 2016

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman
Gregory M. Dexter
465 Park Avenue
New York, New York 10022
Phone & Fax: 888-759-1114
hchaitman@chaitmanllp.com
gdexter@chaitmanllp.com

*Attorneys for Defendants listed on Exhibit A
annexed hereto*

EXHIBIT A

Adv. Pro. No.	Defendants represented by Chaitman LLP
10-04352	RAR Entrepreneurial Fund, Ltd., and Russell Oasis
10-04377	Carol Nelson, individually and as joint tenant; and Stanley Nelson, individually and as joint tenant
10-04644	Russell L. Dusek
10-04658	Carol Nelson